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8 Attorney for Defendant
9 IGNACIO VALENCIA

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13 IN THE UNITED STATES DISTRICT COURT
14 EASTERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 IGNACIO VALENCIA,

19 Defendant.

20 CASE NO. 2:25-CR-0016-TLN

21 STIPULATION REGARDING EXCLUDABLE
22 TIME PERIODS UNDER SPEEDY TRIAL ACT;
23 ORDER

24 DATE: February 13, 2025

25 TIME: 9:30 a.m.

26 COURT: Hon. Troy L. Nunley

27
28 STIPULATION

1. By previous order, this matter was set for status on February 13, 2025.

2. By this stipulation, defendant now moves to continue the status conference until April 10, 2025, at 9:30 a.m., and to exclude time between February 13, 2025, and April 10, 2025, under Local Code T4.

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has represented that it will be producing discovery associated with this case which will include 17 GB of data, multiple BWC and dash cam videos and several hundred pages. All of this discovery will be produced directly to counsel and/or made available for inspection and copying.

b) On February 2, 2025, attorney Shari Rusk was appointed as new counsel of record for defendant Ignacio Valencia.

c) The government is making good faith efforts to produce discovery. Counsel for defendant will need time to review the discovery, to review the charges and potential responses to the charges with her client, to conduct factual investigation and legal research, and to otherwise prepare for trial.

d) Counsel for defendant believes that failure to grant the above-requested continuance would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

e) The government does not object to the continuance.

f) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of February 13, 2025 to April 10, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: February 4, 2025

MICHELE BECKWITH
Acting United States Attorney

/s/ Nicole Vanek
Nicole Vanek
Assistant United States Attorney

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2 Dated: February 4, 2025
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/s/ Shari Rusk
Shari Rusk
Counsel for Defendant
IGNACIO VALENCIA

6 **ORDER**
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8 IT IS SO FOUND AND ORDERED this 7th day of February, 2025.
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12 Troy L. Nunley
13 Chief United States District Judge
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